

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

DEVONE LEE CALHOUN

Case: 2:22-mj-30162

Assigned To : Unassigned

Assign. Date : 3/29/2022

Description: CMP USA v. CALHOUN  
(SO)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 25, 2022 and March 9, 2022 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Count 1: 18 U.S.C. § 922(n)	On or about February 25, 2022 Possession of a firearm while under indictment.
Count 2: 18 U.S.C. § 922(n)	On or about March 9, 2022 Possession of a firearm while under indictment.

This criminal complaint is based on these facts:

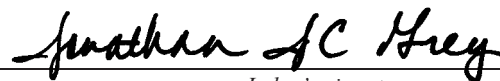
See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Brett J. Brandon, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: March 29, 2022City and state: Detroit, MI

Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Brett J. Brandon, being first duly sworn, hereby state:

**INTRODUCTION**

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. The ATF is currently conducting a criminal investigation concerning DEVONE LEE CALHOUN (DOB: XX/XX/2002). This affidavit does not include all the information known to law enforcement related to this investigation.

4. This affidavit includes sufficient evidence to establish probable cause that CALHOUN, a person under indictment for a crime punishable by

imprisonment for a term exceeding one year, willfully received a firearm, in violation of 18 U.S.C. § 922(n).

### **SUMMARY OF THE INVESTIGATION**

5. Based on an ongoing and joint investigation between the Oakland County Sheriff's Office and the ATF, I know that CALHOUN claims affiliation with the "R Block" gang, a known rival of the "4 Block" gang. Violence between 4 Block and R Block has resulted in over 40 shootings since July of 2021. Many of the shootings involved gang members shooting occupied homes of rival gang members. On several occasions, children, parents, and grandparents have been home or shot during these episodes.

### **CRIMINAL HISTORY**

6. On February 18, 2020 the Oakland County Sheriff's Office (OCSO) arrested CALHOUN for Felony Robbery. On June 10, 2021, CALHOUN was sentenced to twelve months probation pursuant to the terms of the Holmes Youthful Trainee Act (HYTA) after previously pleading guilty to Felony Unarmed Robbery. I am aware based on training and experience investigating violations of 18 U.S.C. § 922(n) that this probationary sentence pursuant to the terms of HYTA qualifies as "any person who is under indictment for a crime punishable by imprisonment for a term exceeding one year..." Michigan Department of Corrections (MDOC) Parole Agent Theresa Krzyzak verified that on June 14,

2021, MDOC advised CALHOUN of the terms of his probation, to include not possessing or owning weapons, including firearms.

### **CUSTODIAL INTERVIEW**

7. On March 29, 2022, I participated in a video-recorded post-*Miranda* interview of CALHOUN, who is currently in custody at the Oakland County Jail. CALHOUN made the following statements.

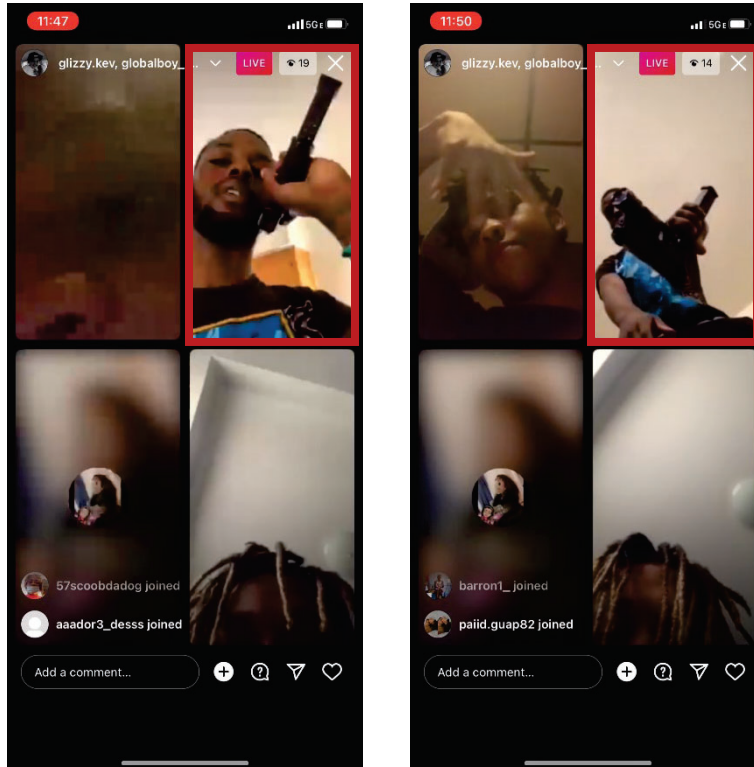
- a. He is on probation pursuant to HYTA for Unarmed Robbery stemming from an Armed Robbery;
- b. He understands that he is charged with the Unarmed Robbery offense until he successfully completes the HYTA probationary period, at which time the charge would be dismissed;
- c. I showed CALHOUN the below screen capture taken of an image posted by Instagram User ID “vonegotti” (an Instagram account utilized by CALHOUN) on February 27, 2022. In the image, I observed CALHOUN standing in a bathroom next to what appears to be a Glock pistol with an extended magazine inserted and an after-market light affixed to the firearm. I am aware based on an investigation into an associate of CALHOUN, that this image was taken on or about February 25, 2022 at the Holiday Inn Express in Pontiac, Michigan.

CALHOUN admitted to receiving the firearm on or about February 25, 2022, identified the firearm as a Glock pistol, and admitted to possessing it for several hours that date in Auburn Hills, Michigan;



- d. I showed CALHOUN the below screen captures taken from a screen recording of an Instagram Live session streamed by Instagram User ID “vonegotti” on March 9, 2022. In the video, CALHOUN (top right box) can be seen brandishing what appears to be a Glock pistol with an extended magazine inserted and an after-market light affixed to firearm. I noted rounds of ammunition visible in the magazine. CALHOUN admitted to

receiving the firearm on or about March 9, 2022, identified the firearm as the same above-referenced Glock pistol, and admitted to possessing it for several hours that date while at an apartment in Pontiac, Michigan;



- e. He knew the Glock pistol was stolen based on information he received about the firearm. Specifically, he knew the firearm was stolen in a manner other than a robbery;
- f. He did not know the make or model of the firearm, but knew it was a Glock pistol.

### INTERSTATE NEXUS

8. On March 9, 2022, I contacted ATF Interstate Nexus Expert, Special Agent Michael Jacobs, and provided a verbal description of Glock pistols. Based upon the verbal description, Special Agent Jacobs advised that the Glock pistols are firearms as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

### CONCLUSION

9. Probable cause exists that DEVONE LEE CALHOUN, a person under indictment for a crime punishable by imprisonment for a term exceeding one year, willfully received a firearm, in violation of 18 U.S.C. § 922(n).

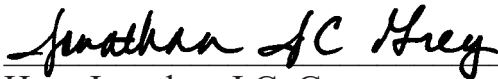
Respectfully submitted,



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Brett J. Brandon  
ATF Special Agent

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



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Hon. Jonathan J.C. Grey  
United States Magistrate Judge

Dated: March 29, 2022